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November 14, 2003

VIA FACSIMILE AND FIRST CLASS MAIL

Ms. Mila Bensing Enforcement Specialist U.S. Environmental Protection Agency Region 5 77 West Jackson Blvd. Chicago, IL 60604-3590

Re: Request for Information [Section 104(e)] IWI, Inc. Site, Summit Illinois

Dear Ms. Bensing:

This is to follow up on our recent discussions regarding CERCLA §104(e) the request for information received from EPA by Rapidforms, Inc. with respect to the IWI Site. As we have discussed, I represent Rapidforms and its parent corporation, New England Business Service, Inc., with respect to this matter. As written, the information request does not appear to Rapidforms to be tailored to request only information regarding Rapidforms' connection with the IWI Site. For example, Request No. 7 could be read to seek identification of all hazardous waste ever generated by Rapidforms, and what was done with that waste. As we have discussed, this makes it extremely difficult to prepare a full and appropriate response to the request. To alleviate that problem, I have asked for and you have agreed to provide information available to EPA regarding (1) the basis upon which EPA believes Rapidforms has some connection, or lack thereof, with the IWI Site and (2) information regarding the time period during which materials allegedly were transported to and disposed of at that site.

This information is important to Rapidforms both because it will allow us to focus the investigation into Rapidforms' connection with the Site and because it will allow us to determine whether the information request is directed to the correct entity. New England Business Services subsidiary Rapidforms was formed as a new corporation in late 1984. Prior to that time, a different corporation, also called Rapidforms, Inc. operated a similar business. The



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liabilities of the old Rapidforms company lie with neither the present Rapidforms nor New England Business Service. If after receipt of the above information from EPA, the corporate history issues become relevant, Rapidforms will make a full disclosure of that to EPA.

As it now stands, Rapidforms' response to EPA's information request is due today. Because EPA has not yet provided the promised information, Rapidforms is unable to provide that response. I understand that you are having some difficulty gathering the information I have requested that we have discussed. I would like now to suggest that EPA and Rapidforms agree that the response will be provided 14 days after it receives the information at issue from EPA. Please let me know if that proposal is acceptable to EPA. If not, I would like to discuss alternate arrangements with you.

Very truly yours,

Kevin L.O'Connor

KJO/ehm

cc:

Tim Morton

Craig Barrows, Esq.

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